

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Devin Michael Konetsco ©

c/o 89 Bailey Run St

Newport, Pennsylvania [17074]
(Enter above the full name of
plaintiff in this action)

v.

Defendant No. 1: County of Perry

Defendant No. 2: President Judge Kenneth A. Mummah

Defendant No. 3: Judge Andrew J. Bender

Defendant No. 4: see attached sheet
(Enter above the full name of
the defendant(s) in this action)

CIVIL CASE NO: 1:25cv1348
(to be supplied by Clerk
of the District Court)

FILED
HARRISBURG, PA

JUL 23 2025

PER IBL
DEPUTY CLERK

COMPLAINT

1. The plaintiff Devin M. Konetsco © ^{natural man} a ~~citizen~~ of
the County of Perry State of
Pennsylvania, residing at c/o 89 Bailey Run St, Newport [17074]
wishes to file a complaint under 42 USC §§ 1983, 1985, 1986; 18 USC §§ 241, 242; US Const.
(give Title No. etc.)
Amend. 4, 5, 6 & 14; Title IV-D Soc. Sec. Act (42 USC § 651 et seq.); 29 USC § 455
2. The defendant is Kenneth A. Mummah, Andrew J. Bender, Perry County Domestic Relations, Perry County
Sheriff's Dept, Clerk of Court Zoe Burd, and County of Perry, all acting under color of law in
Perry County, Pennsylvania, are being sued in their official & personal capacities.
3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper
exhibits that give further information of your case, attach them to this completed form. Use as
much space as you need. Attach extra sheet(s) if necessary) I, Devin Michael Konetsco ©,

3. (CONTINUED) am the plaintiff in this action and bring this complaint against the Perry Court of Common Pleas, its judges, clerks, domestic relations agents, the Perry County Sheriff's Department, and the County of Perry for ongoing violations of my constitutional rights, statutory rights, and due process protections.

Despite my repeated notices and legal objections asserting that, under Title IV-D of the Social Security Act, child support enforcement is voluntary and must be based on lawful contracts and proper jurisdiction, the defendants have unlawfully continued to enforce alleged child support obligations against me.

(Continued on Separate Sheets)

4. WHEREFORE, plaintiff prays that judgement in law and equity are made and prays that this court grant the following relief:

(Continued on Separate Sheets)


(Signature of Plaintiff)

Devin Koretsko
(Printed Name of Plaintiff)

c/o 89 Bailey Run St
Newport, Pennsylvania [17074]

(Address of Plaintiff)

(717) 418-3880
(Phone Number of Plaintiff)

Section I(B) – Continued List of Defendants

**Defendant No. 4: Zoe Burd, Clerk of Court
Perry County Court of Common Pleas
25 W. Main Street
New Bloomfield, PA 17068**

**Defendant No. 5: Perry County Domestic Relations Section
Perry County Courthouse Annex
31 S. Main Street
New Bloomfield, PA 17068**

**Defendant No. 6: Perry County Sheriff's Department
300 S. Carlisle Street
New Bloomfield, PA 17068**

Statement of Claim (Continued)

Plaintiff: Devin Michael Konetsco©

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These actions include issuing unlawful bench warrants, deploying armed sheriff's deputies to the domicile of the living man without proper legal authority, and denying my valid legal filings in violation of my right to due process.

On or about June 21, 2022, my domestic relations account was showing a \$0 balance. Despite the hearing held on October 6, 2022, the account balance was suddenly and inexplicably altered that same day to reflect an increase from \$11,826.69 to \$22,456.69, without proper accounting, full disclosure, or lawful justification to support such change. There was also no due process, accounting, or verification of debt. This financial manipulation is fraudulent and was done without any lawful basis or contract of obligation, constituting conversion, unjust enrichment, and financial fraud.

The defendants, acting under color of law, have ignored my standing as a sui juris living man and the rightful beneficiary of a private trust Estate identified as DEVIN MICHAEL KONETSCO©. They have used administrative and extrajudicial methods to enforce alleged debts and court actions without jurisdiction, without contract, and without affording me basic due process protections. Defendants failed to rebut Plaintiff's jurisdictional challenge, which was properly served and unresponded to, creating estoppel by acquiescence.

The County of Perry, which funded or authorized the employment and compensation of the involved judicial officers, bears responsibility under trust and public accountability doctrines. By employing judges and officers engaged in misconduct, County of Perry became a co-party to the violations and is potentially liable under the Emoluments Clause for improper financial interest, and for failure to ensure impartial, lawful adjudication free from private financial entanglements.

Their continued actions constitute a breach of trust, fraud, and violations of their oaths of office, causing emotional distress, interference with protected rights, and the imposition of liabilities absent lawful authority or due process. Such acts are tantamount to constructive fraud, bad faith administration, and unauthorized exercise of assumed powers over a private estate—all of which are prosecutable and remediable under law.

Definition – Fraud in the Factum:

Fraud in the factum occurs when a person is deceived as to the nature or character of a document they are signing, or is unaware that they are executing a contract or legal instrument, thereby negating their consent. This type of fraud renders any resulting contract or obligation void because there was no true meeting of the minds or informed consent. (See *Restatement (Second) of Contracts* §163; *U.S. v. Peoples*, 250 F.3d 630 (8th Cir. 2001))

(Continued on Separate Sheet)

Statement of Claim (Continued)

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I assert rights secured by the U.S. Constitution, including but not limited to:

- Fourth Amendment (protection from unreasonable searches/seizures)
- Fifth Amendment (due process, takings clause)
- Sixth Amendment (right to confront witnesses, fair trial)
- Fourteenth Amendment (equal protection and due process)

I also assert protections under:

- Pennsylvania Constitution
- UCC § 1-308 (reservation of rights without prejudice)
- 42 U.S.C. § 1983 (civil rights violations under color of law)
- 42 U.S.C. § 1985 (conspiracy to interfere with civil rights)
- 18 U.S.C. § 241 (conspiracy against rights)
- 18 U.S.C. § 242 (deprivation of rights under color of law)
- 18 U.S.C. § 1341 and § 1343 (mail and wire fraud, if relevant)
- 18 U.S.C. § 1951 (Hobbs Act – extortion under color of law)
- 18 U.S.C. § 1961–1968 (Racketeer Influenced and Corrupt Organizations Act – RICO)
- 28 U.S.C. § 455 (disqualification of judge for bias or interest)
- Trust Law, Equity Law, Common Law, Canon Law (including Canon Law 3347 and others applicable), and international treaties protecting human dignity and private estate rights.
- Corpus Delicti (the necessity to prove the crime occurred through objective evidence, supporting the claims of fraud, conversion, and misuse of authority)
- Executive Order 13818 (Imposing sanctions on persons involved in serious human rights abuse or corruption)
- Executive Order 13848 (Imposing certain sanctions in the event of foreign interference in a United States election)

Additional applicable Executive Orders addressing corruption, fraud, and national security matters, including:

- Executive Order 13671 (July 25, 2014) — “Blocking Property of Certain Persons Engaging in Serious Human Rights Abuse or Corruption”
- Executive Order 13685 (December 19, 2014) — “Blocking Property of Certain Persons Engaging in Significant Transnational Criminal Organizations”
- Executive Order 13224 (September 23, 2001) — “Blocking Property and Prohibiting Transactions With Persons Who Commit, Threaten To Commit, or Support Terrorism”

(Continued on Separate Sheet)

Statement of Claim (Continued)

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- Executive Order 13773 (February 28, 2017) — “Enforcing Federal Law with Respect to Transnational Criminal Organizations and Preventing International Trafficking”

All codes, rules, and regulations cited herein apply exclusively to government authorities and officials, and do not apply to natural human beings or creators, in accordance with God's Law.

Universal Declaration of Human Rights, Articles 6, 8, 10, 17

“The U.S. Supreme Court has binding authority over all state court decisions involving questions of federal law or constitutional interpretation, and state courts are not immune from such review or correction.” *Martin v. Hunter's Lessee*, 14 U.S. (1 Wheat.) 304, 347–348 (1816).

Additionally, I assert that court officers, including Domestic Relations agents, acted outside their lawful jurisdiction and in violation of trust law by converting private trust interests into public debt obligations under a presumed social contract or “citizenship” status to which I have not knowingly or willingly consented. I explicitly reserve all rights without prejudice and without waiver of rights, remedies, or protections under UCC § 1-308 and UCC § 1-103.

Multiple attempts to challenge jurisdiction, demand forensic accounting, and exercise my right to file documents have been obstructed, denied, or ignored by the Clerk of Court, court officers, and Domestic Relations agents. Such conduct constitutes abuse of office, breach of fiduciary duty, and willful misconduct.

This complaint also includes charges and references to:

- Kidnapping (unlawful seizure under threat and fraud without lawful court order)
- Human Trafficking (18 U.S.C. §§ 1581–1597; involuntary servitude, peonage, and forced labor through debt bondage)
- Copyright Infringement of the living man's secured and recorded name and estate
- Bond fraud and conversion through unlawful securities actions against private estate
- Commercial fraud and misuse of CUSIP/trust instruments linked to PACSES/DR case numbers

(Continued on Separate Sheet)

Statement of Claim (Continued)

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- PA SCDU denial of payment on fee schedule, creating lawful tacit agreement under estoppel and silent acquiescence
- Non-response to fee schedule by PA SCDU, creating lawful tacit agreement under estoppel and silent acquiescence

These acts reflect a continuing pattern of violations, fraud, abuse of discretion, and unconstitutional practices that have caused irreparable harm to my private status, Estate, liberty, and rights secured under both State and Federal Constitutions.

These actions further support allegations of racketeering, extortion, and the operation of a criminal enterprise under RICO involving multiple agents and offices acting in collusion and bad faith. I claim damages in the amount of \$43 million USD, reflecting economic losses, emotional distress, violations of fiduciary duties, trust conversion, constitutional violations, and injuries to the private estate and trust beneficiary.

This claim is supported by documentation, affidavits, fee schedules, un rebutted affidavits of truth, certified mail receipts, and lawful demand notices previously served upon the relevant parties. These remain un rebutted and stand as truth in commerce and under law.

- The Secretary of State and Attorney General of Pennsylvania failed to rebut my filing of IRS Form 56(f), thereby establishing tacit agreement through non-response.
- Hence, this includes the Affidavit of Truth and First-Hand Knowledge regarding non-rebuttal of IRS Form 56(f) by said public officials.
- *Pollard's Lessee v. Hagan*, 44 U.S. 212 (1845):
"The United States never held any municipal sovereignty, jurisdiction, or right of soil in and to the territory... beyond the temporary powers of a trustee."
- *Rodrigues v. Ray Donovan*, U.S. Department of Labor, 769 F.2d 1344, 1348 (1985) further supports the claims herein.

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Statement of Claim (Continued)

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"Silence can only be equated with fraud where there is a legal or moral duty to speak, or where an inquiry left unanswered would be intentionally misleading."

— *U.S. v. Tweel*, 550 F.2d 297, 299 (5th Cir. 1977)

"Fraud vitiates the most solemn contracts, documents and even judgments."

— *U.S. v. Throckmorton*, 98 U.S. 61 (1878)

Respectfully submitted,

Signed under penalty of perjury under the laws of the United States of America, this 23 day of July, 2025.

_____

Devin Michael Konetsco©

Plaintiff, Pro Se

Beneficiary of the Private Trust Estate

Relief Requested (Continued)

Plaintiff: Devin Michael Konetsco©

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1. Declaration of Rights

That the Court recognize Plaintiff's status as a living man and the sole, rightful beneficiary of the private trust ESTATE identified as DEVIN MICHAEL KONETSCO©, with no lawful delegation of authority, contract, or consent granting jurisdiction to the STATE, its agents, courts, or political subdivisions.

2. Nullification of Unlawful Instruments

That all administrative orders, warrants, liens, garnishments, wage assignments, and monetary obligations imposed without verified jurisdiction, full disclosure, or lawful due process be declared null and void *ab initio*, and removed from all public and private record systems, including but not limited to PACSES #214110772 and Docket DR #15-016.

3. Personal and Official Accountability

That all named Defendants be held jointly and severally liable, in both their personal and official capacities, for acts constituting:

- fraud
 - breach of fiduciary duty
 - abuse of office
 - unlawful conversion
 - impersonation of a trustee
 - civil conspiracy
- in violation of Plaintiff's natural, civil, constitutional, and trust rights.

4. Equitable Injunctive Relief

That a permanent injunction issue enjoining all named Defendants, their successors, agents, assigns, and any cooperating financial or judicial entities from further attempts to enforce, collect, detain, impose jurisdiction upon, or presume authority over the living man or the Estate identified as DEVIN MICHAEL KONETSCO©.

(Continued on Separate Sheet)

Relief Requested (Continued)

Plaintiff: Devin Michael Konetsco©

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5. Forensic Trust and Securities Audit

That the Court order a full, independent forensic audit of all bonds, CUSIP-linked securities, trust instruments, payment ledgers, IRS IMF files, and financial accounts created, monetized, or traded in connection with Plaintiff's name, Estate, identifiers, or case numbers—without express consent—and require restitution of all assets, credits, or funds unlawfully converted or concealed.

6. Compensatory Damages

That Plaintiff be awarded compensatory damages in the amount of \$1,000,000.00 (One Million Dollars) for emotional distress, reputational harm, unlawful detention, deprivation of rights, loss of liberty, and unauthorized commercial exploitation of trust assets.

7. Punitive Damages and Racketeering Penalties

That the Court award punitive damages and treble damages under the RICO Act (18 U.S.C. § 1964(c)) in the amount of \$43,354,000.00 (Forty-Three Million Three Hundred Fifty-Four Thousand Dollars), based on willful misconduct, racketeering, fraudulent securities activity, mail/wire fraud, trafficking in persons, and knowing violations of clearly established fiduciary, constitutional, and contractual limitations.

8. Estoppel and Unrebutted Fee Schedule

That the Court take judicial notice that Plaintiff's original fee schedule and notice of terms, provided to Defendants and left unrebutted, constitutes a lawful contract by acquiescence. That any attempt to enforce jurisdiction without first resolving Plaintiff's unrebutted terms is a violation of both equity and due process, triggering liability by estoppel and constructive fraud.

9. Affirmation of Rights Under Uniform Commercial Code

That the Court affirm Plaintiff's reservation of rights under UCC § 1-308 and all maxims of equity and trust law, and that any presumption of adhesion, consent, or corporate citizenship be deemed rebutted, nullified, and void for lack of full disclosure, meeting of the minds, or lawful contract.

(Continued on Separate Sheet)

Relief Requested (Continued)

Plaintiff: Devin Michael Konetsco©

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10. Other Relief

That the Court grant such other relief as may be deemed just, proper, equitable, and necessary to restore Plaintiff to whole and to prevent further harm, abuse of office, or unauthorized administration of the Plaintiff's private Estate.

Respectfully submitted,

Signed under penalty of perjury under the laws of the United States of America, this 23 day of July, 2025.

A handwritten signature in blue ink, appearing to read "Devin M. Konetsco", is written over a horizontal line.

Devin Michael Konetsco©

Plaintiff, Pro Se

Beneficiary of the Private Trust Estate